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August 31, 1999

2430.002

by: Hand

Ms. Magalie Roman Salas, Secretary  
Federal Communications Commission  
Washington, D.C. 20554

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RECEIVED  
AUG 31 1999  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: MM Docket 99-239  
Amendment of the Table of Allotments  
FM Broadcast Stations  
§73.202(b)  
Johannesburg and Edwards California

Dear Ms. Salas:

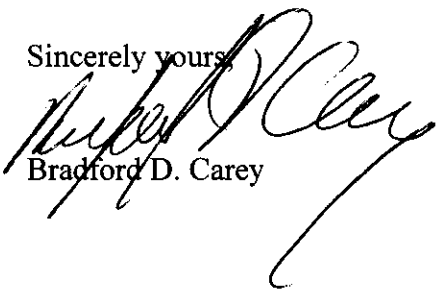
On behalf of Amaturio Group of LA., Ltd., I forward herewith an original and four copies of the Reply Comments of Amaturio Group of LA., Ltd. for filing in the referenced FM allotment proceeding.

These comments are timely filed.

Please feel free to call me with any questions you might have. Additionally, I would be appreciative if a copy of any correspondence regarding this matter would be directed to my attention.

With the best of regards, I am

Sincerely yours,

  
Bradford D. Carey

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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

**RECEIVED**

AUG 31 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

Amendment of Section 73.202(b)  
of the Commission's Rules  
FM Broadcast Station )

RM-

Edwards, California )  
Johannesburg, California )

MM Docket No. 99-239

Avalon, California )  
Fountain Valley, California )  
Adelanto, California )  
Ridgecrest, California )  
Riverside, California )

To: Chief, Allocations Branch,  
Mass Media Bureau

**REPLY COMMENTS**  
**of**  
**AMATURO GROUP OF L.A., LTD.**

August 31, 1999

Amaturo Group of LA., LTD.

By its Attorneys,

Bradford D. Carey  
Ashton R. Hardy

Hardy & Carey, L.L.P.  
110 Veterans Blvd.  
Suite 300  
Metairie, Louisiana 70005  
(504) 830-4644

**REPLY COMMENTS OF AMATURO GROUP OF L.A., LTD.**

Amaturo Group of L.A., Ltd (“Amaturo”), through counsel hereby states its Reply Comments in response to the Notice of Proposed Rule Making (DA-1236, released June 25, 1999) and the other comments filed in response thereto.

**I. AMATURO ESTABLISHED STANDING TO PARTICIPATE.**

The NPRM in this proceeding sought comments on and counterproposals to the proposal of Adelman Communications, Inc. (“Adelman”) seeking substitution of channel 280 A at Edwards, California for channel 281 B1 at Johannesburg, California and modification of its licensee for station KEDD. In its Comments, Amaturo established that it has standing as a competitor and because grant of Adelman’s proposal could impact Commission consideration of Amaturo’s pending proposal to amend the table of Allotments to specify new communities of license for two of its stations and to down-grade KZIQ.<sup>1</sup> The public interest will be well served by adoption of Amaturo’s proposal.

Particularly in view of the Comments filed in this proceeding by Regent Communications, Inc. and High Desert Broadcasting Company (“Regent” and “High Desert” respectively and “Objectors” collectively) suggesting that Adelman’s proposal should be denied because it would, by their analysis, result in some areas receiving fewer than five services, Amaturo’s proposal should be granted in this proceeding.

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<sup>1</sup>Specification of new reference coordinates for certain stations is also sought.

## **II. BACKGROUND.**

On July 15, 1999, Amaturio filed a Petition for Rule Making<sup>2</sup> (“Amaturio’s Petition”) seeking amendment of section 73.202(b), the Table of Allotments of FM Broadcast Stations, by

- (1) re-allotment of channel 224A from Avalon, California to Fountain Valley, California and modification of Amaturio’s license for station KLIT, channel 224A, Avalon, to specify operation on the channel at Fountain Valley;<sup>3</sup> and,
- (2) re-allotment of channel 224A from Riverside, California to Adelanto, California and modification of Amaturio’s license for station KELT, channel 224A, Riverside, to specify operation on the channel at Adelanto;

To accommodate these changes, Amaturio’s Petition seeks modification of section 73.202(b) of the Commission’s Rules and Regulations by

- (3) substitution of channel 224A for channel 224B1 at Ridgecrest, California and modification of the license of station KZIQ-FM accordingly; and,
- (4) specification of revised reference coordinates for station KMLT, Thousand Oaks, California.

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<sup>2</sup> A Technical Exhibit prepared by David E. Dickmann establishing that the changes sought may be implemented in compliance with the Commission’s technical rules was annexed as Exhibit One to Amaturio’s Petition, a copy of which was annexed to Amaturio’s Comments in this proceeding as Attachment A. Figure 6 thereof, as revised, is attached hereto.

<sup>3</sup> Pursuant to Section 1.420(i), the proposed allotment changes can be accomplished without competition from other applicants because the Fountain Valley allotment is mutually exclusive with the present Avalon allotment and the Adelanto allotment is mutually exclusive with the Riverside allotment.

### **III. THE PUBLIC INTEREST BENEFITS OF AMATURO'S PROPOSED CHANGES ARE COMPELLING.**

The public interest will be well served by adoption of the changes to the table of allotments proposed in Amaturro's Petition. Four stations collectively will add service to more than 2.3 million persons, with a loss of one station by fewer than 900,000 people, all of which will still receive service from five or more aural services, except that 107 people will continue to receive four aural services. These minimal losses are more than off-set by gains from Amaturro's overall proposal, in which 187 people will gain their fifth aural service. That these gains will occur in the service area of a station other than KZIQ that is part of Amaturro's proposal (KELT) does not reduce the benefits to be realized by the public and the furtherance of Commission goals.

If channel 224 B1 at Ridgecrest is down-graded to class A, (as Amaturro proposes) *and* channel 280A at Edwards is substituted for channel 280 B1 at Johannesburg (as Adelman proposes) the 107 people that would receive four instead of five services would receive three services and 193 people would receive four instead of five services. Amaturro submits that this should not be decisional, but the very fact that the Objectors are seeking to derail Adelman's proposal due to the losses claimed to be associated with it<sup>4</sup> underscores the importance of the Commission acting favorably on Amaturro's Petition in this proceeding.

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<sup>4</sup>It appears that High Desert's opposition is premised on engineering that was not based on standard assumptions and methodology.

**IV. ADOPTION OF AMATURO'S PROPOSED CHANGES WILL RESULT IN A MORE PREFERENTIAL ARRANGEMENT OF ALLOTMENTS.**

The changes to the table of allotments proposed by Amaturro will result<sup>5</sup> in a more preferential arrangement of allotments and a more equitable distribution of broadcast stations among the various communities as contemplated by Section 307(b) of the Communications Act than presently exists or would exist if Adelman's proposal is adopted but Amaturro's is not. Under Amaturro's proposal:

- 1) No community will lose its only local transmission service.
- 2) The two communities from which allotments are to be removed under Amaturro's proposal will continue to have local aural transmission services.
- 3) No white or grey areas will be created.
- 4) Grand-fathered interference areas would be removed.
- 5) The loss of a fifth aural service by 107 people is more than off-set by the 187 people that will gain a fifth aural service.
- 6) A net population of 1.4 million persons will gain an additional competitive local service.<sup>6</sup>

Amaturro respectfully submits that these facts command grant of its Petition and amendment of the Table of Allotments as Amaturro seeks.

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<sup>5</sup> Amaturro has committed and again hereby commits that if the Commission adopts the changes proposed herein, applications will be promptly filed for construction permits to specify operations on the new channels and at the revised reference coordinates and, if construction permits are granted, facilities will be constructed and operated on the revised allotments. The written agreement of the licensee of KZIQ to implement the changes proposed is attached to Amaturro's Petition.

<sup>6</sup>See Heartland Radio, Inc., 2 CR 449 (1996).

**V. AMATURO'S PROPOSAL IS TO BE PREFERRED  
OVER ADELMAN'S.**

Adelman's proposed changes to the table of allotments, and those proposed by Amaturio are not mutually electrically exclusive. However, in view of the unique factual circumstances, they are mutually legally exclusive to the extent that the Commission might, as urged by the objectors, consider adversely any reduction below five of the number of services that a person might receive were a particular proposed amendment of the Table of Allotments adopted.

Amaturio respectfully submits that the public interest would be served by the Commission, in this proceeding, granting the changes to the FM Table of Allotments sought by both Amaturio and Adelman. However, were the Commission to determine that the public interest would not be served by *both* substitution of channel 280A at Edwards for channel 280B1 at Johannesburg (as sought by Adelman) *and* downgrade of channel 224 at Ridgecrest from class B1 to class A (and the other changes sought by Amaturio), the Commission should select, in this proceeding, the proposal that is to be preferred under its established criteria, that of Amaturio.

Amaturio's proposal would result in two communities receiving their first local transmission service, whereas Adelman's proposal would result in only one community receiving its first local transmission service. Creation of new service in two communities rather than just one is generally preferred by the Commission.

Moreover, the population (53,691) of *one* of the communities to which Amaturo proposes to provide first local transmission service, Fountain Valley, is more than twice that claimed for Edwards under Adelman's theory of population counting. And, as set forth by the Objectors, under other methodology, the Edwards population is substantially lower.

Amaturo's proposal would result in a net of 1.4 million people gaining a reception service. On the other hand, Adelman's proposal would result in 37,445 persons losing a reception service while only 29,885 persons would gain a reception service, for a net loss of a reception service by over 7,500 people.<sup>7</sup>

Amaturo's proposals would result in elimination of grand fathered short-spacing interference to 1.5 million people, whereas Adelman does not even claim that any interference would be eliminated under its proposal.

Under all of these relevant criteria, Amaturo's proposal is to be preferred over that of Adelman.

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<sup>7</sup>These calculations are based on the Technical Statement attached hereto as Exhibit One and are believed to be more precise than were those of Adelman or the Objectors.



**VI. BOTH PROPOSALS CAN BE GRANTED.**

While it is clear that the allotment scheme contained in Amaturó's proposal is to be preferred over the current scheme and that of Adelman's proposal, Amaturó submits that the public interest would also be served by grant of both proposals. If both proposals were adopted:

- 1) A net of more than 1.4 million persons would gain an additional reception service, of which a net of approximately 6,000 persons would gain their fifth service and approximately 2,500 persons would gain their fourth service.
- 2) Three communities would gain their first local transmission service.
- 3) No community will lose its only local transmission service; all three communities from which it is proposed to remove service will continue to have local transmission services.
- 4) No white or grey areas will be created.
- 5) Grand-fathered short-spacing interference to 1.5 million persons will be eliminated.

**VI. CONCLUSION: AMATURÓ'S PETITION SHOULD BE GRANTED.**

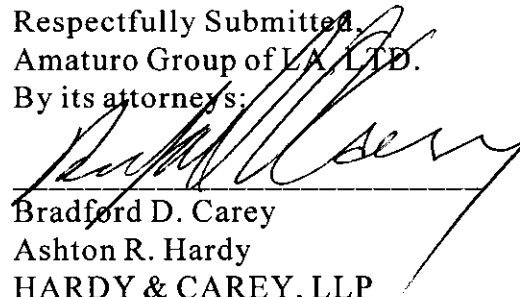
Amaturó's Petition should be granted and the Table of Allotments of FM Broadcast Stations amended as proposed by Amaturó. If both can be granted, the Commission should also grant Adelman's proposal. However, if comparison is necessary, when compared to Amaturó's strong proposal, Adelman's is relatively less preferred under the Commission's criteria and must yield to Amaturó's proposal.

Wherefore, premises considered, it is respectfully urged that the Commission grant the Comments and Counterproposal of Amaturo Group of LA, Ltd., and amend 47 C.F.R. §730202(b), the Table of Allotments of FM Broadcast Stations, as follows:

<u>City (all California)</u>	<u>Present</u>	<u>Proposed</u>
Avalon	204A, 224A	204A
Fountain Valley	--	224A
Riverside	202A, 209A, 224A, 248B, 256B	202A, 209A, 248B, 256B
Adelanto	--	224A
Ridgecrest	224B1, 285 B1	285B1

at the reference coordinates specified and change the allotment reference coordinates for station KMLT, Thousand Oaks as specified in the Technical Exhibit attached to the Petition for Rule Making which was filed on July 15, 1999.

Respectfully Submitted,  
Amaturo Group of LA, LTD.  
By its attorneys:



Bradford D. Carey  
Ashton R. Hardy  
HARDY & CAREY, LLP  
110 Veterans Memorial Blvd  
Suite 300  
Metairie, LA 70005  
(504) 830-4646

Dated as of  
August 31, 1999

**CERTIFICATE OF SERVICE**

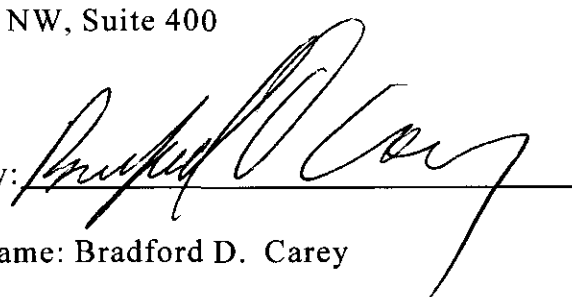
The undersigned, an employee of the law firm of Hardy & Carey, L.L.P., hereby certifies that on this date a copy of the foregoing document has been mailed by First Class United States Mail, postage prepaid, to:

David M. Hunsaker, Esq  
John C. Trent, Esq.  
Putbrese, Hunsaker & Trent  
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Sterling, VA 20167-0217

KZIQ-FM attention:  
James L. Knudsen & Donna L. Knudsen, Licensee  
121 West Ridgecrest Blvd  
Ridgecrest, CA 93555

Kevin C. Boyle  
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Washington, D.C. 20006

Dated: August 31, 1999 By: 

Typed Name: Bradford D. Carey

# EXHIBIT ONE

TECHNICAL STATEMENT  
IN SUPPORT OF  
REPLY COMMENTS  
IN MM DOCKET NO. 99-239  
PREPARED FOR  
AMATURO GROUP OF L.A., LTD.

This Technical Statement was prepared for Amaturro Group of L.A., LTD. in support of Reply Comments in MM Docket No. 99-239. The *Notice of Proposed Rule Making* in MM Docket 99-239 proposed an amendment of the FM Table of Allotments to allot Channel 280A to Edwards, California instead of the current Channel 280B1 at Johannesburg, California.\* The purpose of this statement is to provide additional data concerning the service gain and loss areas and the availability of other reception services in those gain and loss areas; particularly in light of the Amaturro proposal to change the allotment of Channel 224B1 at Ridgecrest, California to Channel 224A at Adelanto, California.†

The determination of service gain and loss areas and the availability of other reception services was prepared according to the procedure outlined by the FCC. The FCC has described the procedure in a number of proceedings. For example, see *Notice of Proposed Rule Making* in MM Docket No. 96-219 (DA 96-1774) at Footnote 1.‡ The essence of the procedure is as follows:

- With the exception of Class C stations, the 60 dBu (1 mV/m) coverage of commercial FM stations is based solely on the maximum coverage for the class of

\* The Johannesburg allotment is occupied by KEDD(FM). The Johannesburg/Edwards proposal is referenced herein as the "KEDD Proposal."

† The Ridgecrest allotment is occupied by KZIQ(FM). The Amaturro proposal is referenced herein as the "KZIQ Proposal."

‡ See also, *Memorandum Opinion and Order* in MM Docket No. 91-180, wherein the Commission specifically stated that non-commercial educational FM stations are to be treated in the same manner as Class C stations for projecting coverage.

the subject station. For example, Class A stations have a 60 dBu coverage circle of 28 km.

- The 60 dBu coverage circle for Class C stations and non-commercial educational FM (NCE-FM) stations is based upon the actual facilities using uniform terrain. For NCE-FM stations with directional antennas, the directional antenna pattern is employed but under the assumption of uniform terrain.
- Service for AM stations is based on fulltime service only. For Class A AM stations, the 0.5 mV/m groundwave contour is employed. For all other classes of AM station, the reception service is based upon the station's nighttime interference-free contour.

Other AM and FM reception services were projected over the gain and loss areas determined for the subject proposal. Studies were prepared considering both commercial FM and NCE-FM stations. Population within the subject areas was determined by summing the population of the U.S. Census block centroids that would be contained within the subject area. Area was computed using numerical integration.

Figure 1 is a tabulation comparing the gain and loss area and population figures for the KEDD Proposal considering AM stations and both commercial FM and NCE-FM stations; and considering AM stations and only commercial FM stations. Additional analyses were conducted under this heading with and without consideration of the KZIQ Proposal. Similarly, the results of an analysis of the KZIQ Proposal are summarized in Figure 2, with and without the KEDD Proposal.

Also included herein is a revised Figure 6 of the KZIQ Proposal Technical Exhibit that filed as a counterproposal in the Johannesburg/Edwards, California matter. Figure 6 was revised to take into account the recalculation of other reception services to the proposal gain and loss areas considering NCE-FM stations with uniform terrain. The Technical Exhibit inadvertently employed a terrain analysis instead of uniform terrain in computing NCE-FM stations.

I certify that the foregoing was prepared by me, or under my direction; and that it is true and correct to the best of my knowledge and belief.



Louis Robert du Treil, Jr.

du Treil, Lundin & Rackley, Inc.  
201 Fletcher Ave.  
Sarasota, Florida 34237

August 30, 1999

Service Area for KEDD Proposal	Considering non-commercial FM stations				Not considering non-commercial FM stations			
	Without KZIQ Proposal		With KZIQ Proposal		Without KZIQ Proposal		With KZIQ Proposal	
	Population (1990)	Area (km <sup>2</sup> )	Population (1990)	Area (km <sup>2</sup> )	Population (1990)	Area (km <sup>2</sup> )	Population (1990)	Area (km <sup>2</sup> )
Total KEDD Loss	37,445	4,637	37,445	4,637	37,445	4,637	37,445	4,637
5 or more other	37,338	3,980	37,145	2,949	35,883	2,173	35,310	1,501
4 other	107	657	193	1,042	1,455	1,521	1,835	1,462
3 other	--	--	107	646	107	943	193	755
2 other	--	--	--	--	--	--	107	919
Total KEDD Gain	29,885	2,323	29,885	2,323	29,885	2,323	29,885	2,323
5 or more other	21,509	1,418	21,509	1,418	21,036	1,055	21,036	1,055
4 other	5,964	350	5,964	350	6,388	591	6,388	591
3 other	2,412	346	2,412	346	2,461	458	2,461	458
2 other	0	209	0	209	0	219	0	219

Figure 1



Service Area for KZIQ Proposal	Considering non-commercial FM stations				Not considering non-commercial FM stations			
	Without KEDD Proposal		With KEDD Proposal		Without KEDD Proposal		With KEDD Proposal	
	Population (1990)	Area (km <sup>2</sup> )	Population (1990)	Area (km <sup>2</sup> )	Population (1990)	Area (km <sup>2</sup> )	Population (1990)	Area (km <sup>2</sup> )
Total KZIQ Loss	888	2,508	888	2,508	888	2,508	888	2,508
5 or more other	781	1,870	588	846	582	803	9	842
4 other	107	638	193	1,024	199	785	579	731
3 other	--	--	107	638	107	920	193	743
2 other	--	--	--	--	--	--	107	920
Total KZIQ Gain	0	192	0	192	0	192	0	192
5 or more other	0	0	0	0	0	0	0	0
4 other	0	93	0	93	0	0	0	0
3 other	0	99	0	99	0	192	0	192
2 other	--	--	--	--	--	--	--	--

Figure 2

Figure 6

TECHNICAL EXHIBIT  
IN SUPPORT OF  
A PETITION FOR RULE MAKING  
TO AMEND THE FM TABLE OF ALLOTMENTS  
AVALON, FOUNTAIN VALLEY, RIVERSIDE,  
ADELANTO AND RIDGECREST, CALIFORNIA

Summary of Gains and Losses  
In Population and Area

Station	Number of Other Services	Gain		Loss	
		Land Area (sq km)	Population (1990 Census)	Land Area (sq km)	Population (1990 Census)
KLIT	5	1,221	2,116,205	193	3,317
KELT	5	2,067	125,942	2,308	803,792
	4	241	187	0	0
	3	0	0	0	0
	Total KELT	2,308	126,129	2,308	803,792
KMLT	5	376	68,826	137	89,001
KZIQ-FM	5	0	0	1,870	781
	4	93	0	638	107
	3	99	0	0	0
	Total KZIQ	192	0	2,508	888

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the subject station. For example, Class A stations have a 60 dBu coverage circle of 28 km.

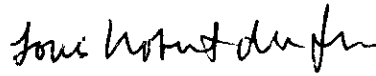
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Other AM and FM reception services were projected over the gain and loss areas determined for the subject proposal. Studies were prepared considering both commercial FM and NCE-FM stations. Population within the subject areas was determined by summing the population of the U.S. Census block centroids that would be contained within the subject area. Area was computed using numerical integration.

Figure 1 is a tabulation comparing the gain and loss area and population figures for the KEDD Proposal considering AM stations and both commercial FM and NCE-FM stations; and considering AM stations and only commercial FM stations. Additional analyses were conducted under this heading with and without consideration of the KZIQ Proposal. Similarly, the results of an analysis of the KZIQ Proposal are summarized in Figure 2, with and without the KEDD Proposal.

Also included herein is a revised Figure 6 of the KZIQ Proposal Technical Exhibit that filed as a counterproposal in the Johannesburg/Edwards, California matter. Figure 6 was revised to take into account the recalculation of other reception services to the proposal gain and loss areas considering NCE-FM stations with uniform terrain. The Technical Exhibit inadvertently employed a terrain analysis instead of uniform terrain in computing NCE-FM stations.

I certify that the foregoing was prepared by me, or under my direction; and that it is true and correct to the best of my knowledge and belief.



Louis Robert du Treil, Jr.

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August 30, 1999

Service Area for KEDD Proposal	Considering non-commercial FM stations				Not considering non-commercial FM stations			
	Without KZIQ Proposal		With KZIQ Proposal		Without KZIQ Proposal		With KZIQ Proposal	
	Population (1990)	Area (km <sup>2</sup> )	Population (1990)	Area (km <sup>2</sup> )	Population (1990)	Area (km <sup>2</sup> )	Population (1990)	Area (km <sup>2</sup> )
Total KEDD Loss	37,445	4,637	37,445	4,637	37,445	4,637	37,445	4,637
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5 or more other	21,509	1,418	21,509	1,418	21,036	1,055	21,036	1,055
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2 other	0	209	0	209	0	219	0	219

Figure 1

Service Area for KZIQ Proposal	Considering non-commercial FM stations				Not considering non-commercial FM stations			
	Without KEDD Proposal		With KEDD Proposal		Without KEDD Proposal		With KEDD Proposal	
	Population (1990)	Area (km <sup>2</sup> )	Population (1990)	Area (km <sup>2</sup> )	Population (1990)	Area (km <sup>2</sup> )	Population (1990)	Area (km <sup>2</sup> )
Total KZIQ Loss	888	2,508	888	2,508	888	2,508	888	2,508
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3 other	--	--	107	638	107	920	193	743
2 other	--	--	--	--	---	--	107	920
Total KZIQ Gain	0	192	0	192	0	192	0	192
5 or more other	0	0	0	0	0	0	0	0
4 other	0	93	0	93	0	0	0	0
3 other	0	99	0	99	0	192	0	192
2 other	--	--	--	--	--	--	--	--

Figure 2

TECHNICAL EXHIBIT  
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AVALON, FOUNTAIN VALLEY, RIVERSIDE,  
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KLIT	5	1,221	2,116,205	193	3,317
KELT	5	2,067	125,942	2,308	803,792
	4	241	187	0	0
	3	0	0	0	0
	Total KELT	2,308	126,129	2,308	803,792
KMLT	5	376	68,826	137	89,001
KZIQ-FM	5	0	0	1,870	781
	4	93	0	638	107
	3	99	0	0	0
	Total KZIQ	192	0	2,508	888